



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

November 7, 2013

Mr. Thomas Donohue  
Senior Manager  
Pfizer Inc.  
100 Route 206 North  
Peapack, New Jersey 07977

US EPA RECORDS CENTER REGION 5



1000570

Dear Mr. Donohue:

SUBJECT: Approval of Summary of Pre-Excavation Verification Soil Sample Results, Target PCB Soil Excavation Areas (Summary); Warner-Lambert Company, LLC, Subsidiary of Pfizer Inc. (Warner-Lambert) Holland, Michigan; MID 006 013 643

Warner-Lambert received Coordinated Approval for Cleanup of Polychlorinated Biphenyls (PCBs) from the Michigan Department of Environmental Quality (MDEQ) on May 3, 2013, and the U.S. Environmental Protection Agency (EPA), Region 5, on June 20, 2013, which approved the PCB Remediation Plan subject to stipulations. Those stipulations included additional soil delineations samples, extending one of the proposed excavation areas, and future modification of the Postclosure plan upon approval of the final site Corrective Measures Implementation Plan/Remedial Action Plan to address long-term operation, maintenance, monitoring, and financial assurance obligations necessary for site-wide corrective action, including any remaining obligations (e.g., restrictive covenants) associated with the approved PCB Remediation Plan.

The MDEQ has completed its technical review of the Summary pursuant to Part 111, Hazardous Waste Management, including the environmental protection or cleanup standards and associated requirements pursuant to Part 201, Environmental Remediation, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), Michigan Compiled Laws (MCL) §§324.11101 *et seq.* and 324.20101 *et seq.* and the Resource Conservation and Recovery Act of 1976 (RCRA), Subtitle C, corrective action requirements of Title 42 of the United States Code §6901 *et seq.* Based on that review the additional soil delineation results and extension of the excavation area presented in the Summary are approved and Warner-Lambert can proceed to implement the approved PCB Remediation Plan.

Should you have any questions regarding this review, please contact me at slaytond@michigan.gov; or DEQ, OWMRP, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,

David Slayton  
Geologist Specialist  
Hazardous Waste Section  
Office of Waste Management and  
Radiological Protection  
517-284-6571



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

November 12, 2013

Mr. Thomas A. Peters  
Senior Project Manager  
The Mannik & Smith Group, Inc.  
2365 Haggerty Road South  
Canton, Michigan 48188

Dear Mr. Peters:

SUBJECT: SB01-06 PCB Area of Concern (AOC) Notification Letter; Ford Motor Company (Ford), Monroe Plant; MID 005 057 005

The Michigan Department of Environmental Quality (MDEQ), Office of Waste and Radiological Protection (OWMRP), accepts the October 7, 2013, letter prepared and submitted by the Mannik & Smith Group, Inc. (MSG) on behalf of Ford, identifying a new polychlorinated biphenyl (PCB) AOC at the Ford Monroe Plant pursuant to Condition VD.1.(a)-(f) of the Hazardous Waste Management Facility Postclosure Operating License (License) issued on December 7, 2012, under Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

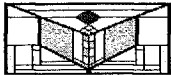
Additional environmental sampling information was submitted on July 12, 2013, in compliance with Conditions II.H.4 and V.E. of the License. The new PCB AOC (SB01-06) has soil PCB levels above the U.S. Environmental Protection Agency, (U.S. EPA) Toxic Substances Control Act of 1976 (TSCA) criterion of 50 parts per million (ppm), with a maximum of 330 ppm at SB-06.

The Ford Monroe Plant is subject to the federal Resource Conservation and Recovery Act of 1976 (RCRA) Subtitle C Corrective Action (CA) requirements. The MDEQ is the lead agency in oversight of RCRA CA obligations at the Ford Monroe Plant under its authority as a state authorized to implement RCRA, Title 42 of the United States Code, Section 6926 and in furtherance of its statutory and regulatory responsibilities pursuant to Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), Michigan Compiled Laws (MCL) 324.1101 *et seq.* and MCL 324.20101 *et seq.*

The MDEQ is requiring the submittal of a remedial investigation work plan (RIWP) for the new PCB AOC within 60 days of receipt of this letter, pursuant to Condition VE. of the License.

107/08/20041

BP IL



James Blough/R5/USEPA/US

To

07/08/2004 09:14 AM

Subject

----- Forwarded by James Blough/R5/USEPA/US on 07/08/04 09:14 AM -----



Laurence\_Verkoulen@URSC  
orp.com

To

06/20/04 10:14 AM

Subject

Hi Jim,

You requested that I send you the following information:

- Adjusted Standard for Delay of Closure of the East Surge Pond (1992)
- Notice of Violation for the Mississippi River Seep (1994)

These documents are attached as pdfs.

You requested a discussion of why Amoco was granted an adjusted standard by the Illinois Pollution Control Board (ICPB) from the liner requirements for the East Surge Pond required under 35 IAC 724.321(c) and 35 IAC 725.321(a).

The reasons why the IPCB felt that the adjusted standard for the liner requirements is appropriate are stated in the Board Discussion on page 11 of the Adjusted Standard.

You also wanted to know who the inspectors were on-site during the visual inspection for removal of impacted material from Ponds 2, 3, and 4 (the East Surge Pond). Chris Cahnovsky of the IEPA visually inspected Pond 2 in 1994, and stated that the sludge was sufficiently removed to warrant conditional approval. This is documented on page 1 of the Remarks Section of the attached Notice of Violation for the Mississippi River Seep (page 7 of 14 of the pdf).

The Hazardous Waste Removal Plan (dated April 1991) that I previously sent you via fax discussed the completed IEPA visual inspections for Ponds 3 and 4.

I hope this satisfies your questions regarding delay of closure of the East Surge Pond.

I will send you a separate e-mail in response to your other questions about the Part B Permits.

Thanks,

Larry Verkoulen  
Project Environmental Scientist  
URS Corporation  
122 South Michigan Avenue Suite 1920  
Chicago, IL 60603

Direct phone: 312-697-7224



fax: 312-939-4198 1992\_Adjusted Standard.pdf 1994\_NOV.pdf

107/08/20041



James Blough /R5/USEPA/US To

07/08/2004 09:14 AM

Subject Fw: some question for you

----- Forwarded by James Blough/R5/USEPA/US on 07/08/04 09:14 AM -----



Laurence\_Verkoulen@URSC To  
orp.com

06/22/04 10:25 AM

Subject Re: some question for you

Please see my responses to your questions below in blue.  
If you have additional questions, please let me know.

Thanks,

Larry Verkoulen  
Project Environmental Scientist  
URS Corporation  
122 South Michigan Avenue Suite 1920  
Chicago, IL 60603

Direct phone: 312-697-7224  
fax: 312-939-4198

Blough.James@epam  
ail.epa.gov  
laurence\_verkoulen@URSCorp.com

To:

cc:

06/04/2004 04:05  
PM

Subject: some question for you

Larry

From page Page V-10 of V-15 of September, 1993, LPC No. 1191150001, RCRA Log No. 147 are we still doing interim corrective action? or has thing changed

2. The interim corrective action program shall control the horizontal and vertical flow in the vertical column of water present in the uppermost aquifer beneath the Riverfront Property and monitor the position and rate of migration of the hydrocarbon pool as follows:

Did you do this and if so do you have a copy of it? We can talk about this when I get back.

There is a typographical error in Condition V.2. The reference to Riverfront should be changed to Main Plant.

BP complies with Section V.E.2 of the Main Plant Part B Permit (B-147) as follows:

The groundwater of the uppermost aquifer is controlled by the Gradient control wells in accordance with Condition V.E.2.a. The pumping rates from each of the four Cone-of-Depression pumping wells (G662, G664, G665, and G666) are recorded daily, and are used to calculate the monthly average groundwater withdrawal rate in accordance with Condition V.E.2.b. The daily COD well pumping rates and the average monthly withdrawal rate are reported semi-annually to the Illinois EPA.

ILD980700967

Page V-11 of V-15

E. GROUNDWATER MONITORING PROGRAM

6. The Permittee shall submit an application for permit modification if a demonstration cannot be made that the groundwater flow in the uppermost aquifer is being controlled as required by Condition II.E.2. This application must contain a revised corrective action program meeting the requirements of 35 IAC 724.200 which provides for removal or treatment of contaminated groundwater beneath the Riverfront Property and be submitted within ninety (90) days of the date that the demonstration required by Condition II.E.3 was attempted.

Do you have the following did we follow item 8 c. We can talk about this when I get back.

8. The Permittee shall develop a brief report evaluating each set of monitoring results collected in accordance with Conditions II.D., II.E and II.F and place it in the operating record for the facility. This report must evaluate each set of results and determine whether or not the groundwater flow in the uppermost aquifer is being adequately controlled to contain any contaminant plume originating from the Riverfront Property as required by Condition II.E.3. The information collected in accordance with Condition II.E.15 should also be utilized in developing this report. If data indicates that groundwater flow is not being adequately controlled, the Permittee shall:
  - a. Notify the Agency in writing within seven (7) days of the date that this determination is made;
  - b. Take actions as necessary to regain the control of groundwater flow as required by Condition II.E.3.
  - c. Submit a written report to the Agency within thirty (30) days describing the actions taken to regain control of groundwater flow. In addition, the report must contain

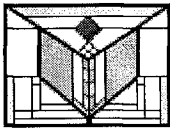
307/08/20043

information which demonstrates that groundwater flow is being adequately controlled.

d. Submit a request for permit modification to the Agency within sixty (60) days describing any changes which must be made to the corrective action program to ensure that the groundwater flow is adequately controlled.

Item 8 contains several typographical errors. The referenced conditions should be changed to V.E., V.E., and V.F. Additionally, there is no Condition II.E.2 or Condition V.E.II in the Main Plant Permit. Additionally, the reference to the Riverfront should be changed to the Main Plant.

To answer your question, the monitoring results collected in accordance with Conditions V.D., V.E., and V.F are submitted to the Illinois EPA semi-annually.



James  
Blough/R5/USEPA/US

06/04/04 03:15 PM

To

cc

bcc

Subject

Larry

From page Page V-10 of V-15 of September, 1993, LPC No. 1191150001, RCRA Log No. 147 are we still doing interim corrective action? or has thing changed

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ILD980700967

Page V-11 of V-15

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- d. Submit a request for permit modification to the Agency within sixty (60) days describing any changes which must be made to the corrective action program to ensure that the groundwater flow is adequately controlled.



Pink  
B-147-CA-14

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

217/524-3300

August 13, 2002

CERTIFIED MAIL

7001 2510 0002 3279 8113

Gregory S. Jevyak, Environmental Business Manager  
Global Environmental Management Business Company  
301 Evans Avenue  
P.O. Box 167  
Wood River, Illinois 62095

Re: 1191150001 -- Madison County  
BP Products North America Inc. - Wood River Refinery  
ILD980700967  
Log No. B-147-CA-14  
RCRA Permit

Dear Mr. Jevyak:

This is in response to several recent submittals regarding RCRA corrective action activities at an area known as the "Northeast Corner Parcel (Area 2)" at the above-referenced facility (a list of these submittals is provided in Attachment 1 to this letter). A site layout map showing this area within the facility and the parcel's legal description, are provided as Attachments 2 and 3 respectively. Overall, the corrective action activities at the subject facility are being conducted in accordance with a RCRA permit issued to the facility (Log No. B-147 and associated modifications).

The submittals identified in Attachment 1 to this letter contain information regarding the investigative and remedial activities completed to date in Area 2. Illinois EPA had previously approved plans for conducting these activities for all recognized environmental conditions in Area 2 on August 15, 2000. Based on a review of the information, Illinois EPA has determined that no further action is necessary in Area 2 provided the following requirements are met:

1. Two areas within Area 2 require an engineered barrier and associated institutional control meeting the requirements of 35 Ill. Adm. Code 742 to restrict exposure to the soils beneath the barrier. The institutional control must require maintenance of the engineered barrier, implementation of a site safety plan to protect construction workers during construction activities associated with these two areas, and proper management of any soil removed from beneath the engineered barrier. A plan view of Area 2 delineating the two areas where an engineered barrier must be established is presented in Attachment 4 to this letter.

Mr. Gregory Jevyak  
Log No. B-147-CA-14  
Page 2

2. Any excavation and subsurface construction work in Area 2 shall be conducted in accordance with a site health and safety plan designed to restrict direct worker exposure to impacted soils in Area 2 and all the construction workers shall be equipped with appropriate personal protective equipment as required and specified by the site health and safety plan.
3. The soil within Area 2 shall remain in place, except where necessary to remove it for construction activities.
4. Soil excavated during construction/demolition/excavation activities within Area 2 must be evaluated to determine if it is contaminated. This determination shall be made by a visual inspection and by subjecting the soils to a field screening test for volatile organic compounds (VOCs). Soil shall be considered "contaminated" if (1) there is a visual discoloring of the soil indicative of hydrocarbon product; or (2) the field screening test detects the presence (i.e. PID readings >100 units) of VOCs in soil. Soils exhibiting potential contamination based on the visual or field screening will either be sampled for VOC and SVOC analysis or considered contaminated. If laboratory analytical data indicates constituents in soil are less than the Illinois EPA approved site specific remediation objectives (ROs) developed for the parcel then the soils will be considered to be not contaminated for reuse on the Main Plant property. If the soils are less than the site specific ROs but greater than residential standards they will be considered contaminated if transported offsite.
  - (1) If the soil is found to be contaminated, then it must be sent off-site for disposal as a special waste in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.
  - (2) If the soil is uncontaminated, as determined by visual inspection and field screening, then it may be used as clean fill in other areas of the former refinery facility. However, procedures must be in place to ensure that this material remains on the former refinery facility and is not be transported off-site, unless it is transported off-site as a special waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal or unless such material is shown to not be a special waste to the satisfaction of Illinois EPA.
  - (3) Documentation of all these activities must be placed in the facility's operating records.
5. Future use of Area 2 must remain commercial/industrial

Mr. Gregory Jevyak  
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Page 3

6. Appropriate institutional controls meeting the requirements of 35 Ill. Adm. Code, Part 742, Subpart J must be established and recorded to ensure the requirements in Conditions 1, 2, 3, 4, 5, 7 and 8 will be met in the future.
7. Contaminated soil present at the following sample locations is properly managed via engineered barriers or SWMU9-BH02 addressed to achieve remediation objectives developed in accordance with 35 Ill. Adm. Code 742:

LR-NE-03  
LR-NE-03-E020

LR-NE-03-N020  
LR-NE-07

8. The groundwater beneath the facility is being and must continue to be addressed in accordance with Section V of the RCRA Part B permit and all subsequent permit modifications. Groundwater activities associated with the uppermost aquifer are subject to the following conditions:
  - a. The groundwater within the Parcel must still be addressed in accordance with Section V of the RCRA Part B permit and all subsequent permit modifications:
  - b. The March 28, 2002 letter from the Illinois EPA approved the City of Wood River Ordinance 02-01 and Memorandum of Understanding (MOU) between the City and the Illinois EPA for use as an institutional control. This approved institutional control meets the criteria found in 35 Ill. Adm. Code 742.925, to exclude the groundwater ingestion exposure route, established in accordance with 35 Ill. Adm. Code Part 742, Subpart J. Therefore, no further action is required with respect to the groundwater at the Parcel, except as required by Condition 8(a) above; and
  - c. In an Illinois EPA letter dated March 13, 2002, the Groundwater Management Zone (GMZ) for the uppermost aquifer at the facility was revised to include the areas where constituent concentrations in groundwater exceed Class I groundwater standards. Following Illinois EPA's review of the associated permit modification request dated May 10, 2002 for the revised GMZ, the Illinois EPA will modify the RCRA Part B permit to incorporate the revision to the GMZ.
9. Prior to completion of a corrective action associated with a GMZ the groundwater quality standards (Class I or Class II) are not applicable while the GMZ is being monitored and maintained. As stated in Condition 8 of the February 5, 2002 letter from the Illinois EPA to BP, a GMZ may not be used to restrict the use of groundwater in the vicinity of the subject property. A GMZ does not prohibit the use of groundwater within its boundary.

Mr. Gregory Jevyak  
Log No. B-147-CA-14  
Page 4

and therefore does not meet the definition of an institutional control as found in 35 Ill. Adm. Code 742.1000(c).

10. Additional field duplicates must be collected in future groundwater sampling events. One (1) field duplicate must be collected for every ten (10) samples collected.
11. Overall, corrective action activities at the former refinery facility must continue to be implemented in accordance with: (1) this letter, (2) 35 Ill. Adm. Code 620, 724.201, and 742; and (3) the requirements set forth in its RCRA Part B permit (Log No. B-147) and all other associated modifications or other comparable mechanism issued thereafter by the Illinois EPA for this facility.
12. A completed RCRA Corrective Action Certification form (copy enclosed) must accompany all submittals made to Illinois EPA regarding RCRA corrective action activities at this facility.

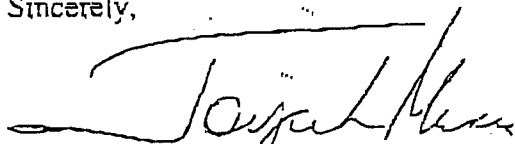
This letter shall constitute Illinois EPA's final decision on the subject submittal. Within 35 days of the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed ninety days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Mr. Gregory Jevyak  
Log No. B-147-CA-14  
Page 5

Should you have any questions concerning groundwater-related aspects of this letter, please contact Ryan Bennett at (217) 558-2150. Questions about any other aspects of this letter should be directed to James K. Moore, P.E. at 217/524-3295.

Sincerely,



Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

SLM:JKM:bjh\20021582s.doc  
JEM

- Attachments:
1. List of Area 2 Submittals
  2. Topographic Map/Site Layout Map
  3. Legal Description of Area 2
  4. Portions of Area 2 Requiring an Engineered Barrier
  5. Corrective Action Certification Form

bcc: Bureau File  
Collinsville Region  
Jim Moore  
Joyce Munie  
Terri Blake Myers  
Ryan Bennett  
Munib Ahmad



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

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OUR PHONE NUMBER IS (217) 524-3300

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